

MEAGHER & GEER
ATTORNEYS AT LAW PLLP

33 South Sixth Street, Suite 4400
Minneapolis, MN 55402
612-338-0661
meagher.com

Nicole L. Brand
Direct Dial: 612/347-9175
Direct Fax: 612/877-3070
E-Mail: nbrand@meagher.com

September 6, 2018

*Legal Mail: Open Only in the
Presence of the Inmate*
Tony Terrell Robinson
Reg. No. 18099-041
FCI Greenville
P.O. Box 5000
Greenville, IL 62246

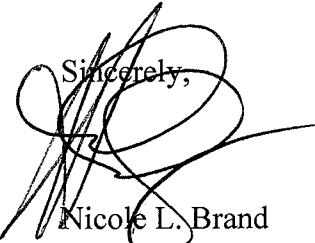
RE: Tony Terrell Robinson v. Stephen Dannewitz, M.D., et al.
Court File No.: 17-CV-0437
Our File No.: 52394-8

Dear Mr. Robinson:

I am writing in response to your letter dated August 24, 2018 in response to execution of medical authorizations. I understand that you are not willing to provide a medical authorization – claiming that the information seeks privileged, confidential information that is not relevant to the claims you are raising.

You have brought a claim of medical malpractice against my client. By doing so, you have voluntarily placed your medical condition in controversy. Rule 35 of the Rules of Civil Procedure operates to waive any privilege under circumstances where a party voluntarily places his or her medical condition at issue. *See Younggren v. Younggren*, 556 N.W.2d 228 (Minn. Ct. App. 1996). The compulsory waiver of physician-patient privilege is mandated in all cases in which the health of the patient is put in issue by the patient. *Wenninger v. Muesing*, 307 Minn. 405, 240 N.W.2d 333 (1976).

Please do forward me the signed medical authorization promptly so that this matter may proceed.

Sincerely,

Nicole L. Brand

NLB/mrw:12375040.1

cc: Anthony J. Novak, Esq.
Sally J. Ferguson, Esq.

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bcc: Tanya E. Springman, J.D. (Claim No. 1058504) (*tanya.springman@medpro.com*)
Larisa Maslic, ARM, LHRM, CA (*lmaslic@crosscountry.com*)
Stephen Dannewitz, M.D. (*sdannewitz@hotmail.com*)